

COMMENTS

The enclosed is responsive to the Examiner's Office Action mailed on September 25, 2002. At the time the Examiner mailed the Office Action, claims 1 through 6 and 28 through 48 are pending. By way of the present response the Applicant has: 1) amended claims 1 through 6, 28, 30, 31, 33 through 35, and 37 through 48; and, 2) neither canceled nor added any claims. As such, claims 1 through 6 and 28 through 48 remain pending. The applicant respectfully requests reconsideration of the present application.

The Examiner rejected claims 28-39 under 35 USC 112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicant regards as the invention. More specifically, the Examiner: 1) rejected claim 28 on antecedent basis concerns because of reference to "a physical line" in lines 8 and 12; and, 2) rejected claim 37 because of the word "though". In response the Applicant has: 1) amended claim 28 to cure the antecedent basis issue raised by the Examiner; and, 2) replaced the word "though" with the word "through" in claims 37 through 39. The Applicant respectfully submits that the Examiner's rejections have been overcome and that the claims are in compliance with the second paragraph of 35 USC 112. No new matter has been added.

The Examiner rejected each of independent claims 1, 28, 40 and 45 under 35 USC 103 as being obvious in view of the combination of U.S. Patent No. 6,026,086 (hereinafter, "Lancelot") and U.S. Patent No. 5,946,634

(hereinafter, "Korpela"). In response, note that the Applicant has amended claim 1 to further recite:

- detecting a second request to establish a second network connection that flows through the hardware platform;
- determining a second type of network service used by the second network connection;
- downloading in response to the determining a second type of network service, to the hardware platform, software that is specific to the second type of network service; and

- executing the software that is specific to the second type of network service to process traffic over the second network connection according to the second type of network service, the software that is specific to the first type of network service being executed simultaneously with the software that is specific to the first type of network service so that the hardware platform can simultaneously process traffic over the first connection and the second connection.

Here, the Examiner should observe that Korpela does not teach or suggest the downloading of a first and second software (where the first software is specific to a first type of network service and where the second software is specific to a second type of network service) so that a first type of networking service and a second type of networking service can be simultaneously provided (e.g., a first connection is sustained according to the first type of networking service while a second connection is sustained according to the second type of networking service).

Looking at Korpela in its most favored light with respect to the Examiner's position (and without being an admission by the Applicant that Korpela actually teaches as much), at best Korpela only teaches or suggests the downloading of software so that only a single network service type can be used at any given time. Better said, the mobile terminal of Korpela is incapable of simultaneously communicating according to a first networking service type and a second

networking service type (e.g., by simultaneously sustaining a first connection according to a first service type and a second connection according to a second networking service type). See, Korpela Column 5, lines 14 through 21 (and in particular Korpela's use of the term "a selected one" on line 18). For at least this line of reasoning, independent claim 1 is patentable over the combination of Lancelot and Korpela.

For at least similar reasoning, moreover, each of independent claims 28, 40, 45 are also patentable over the combination Lancelot and Korpela (and/or the combination of Lancelot, Korpela and U.S. Patent No. 5,497,373 ("Hulen")).

As each of the independent claims of the present application are patentable, the Applicant respectfully requests the allowance of all claims.

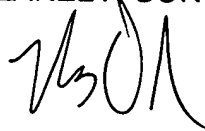
Applicants respectfully submit the present application is in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call Robert O'Rourke at (408) 720-8300.

Authorization is hereby given to charge our Deposit Account No. 02-2666
for any charges that may be due.

Respectfully submitted,

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Date: 1/27/03



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CLAIM AMENDMENTS SHOWING CHANGES

The following is a list of all pending claims including claims not amended by way of the present response.

Please amend claims 1 through 6, 28, 30, 31, 33 through 35, and 37 through 48.

1. (four times amended) A method for a single hardware platform to support multiple types of network service, comprising:

detecting a first request to establish a first network connection that flows through the hardware platform;

determining a first type of network service used by the first network connection;

downloading in response to the determining, to the hardware platform, software that is specific to the first type of network service; [and]

executing the software to process traffic over the first network connection[,], according to the first type of network service[.];

detecting a second request to establish a second network connection that flows through the hardware platform;

determining a second type of network service used by the second network connection;

downloading in response to the determining a second type of network service, to the hardware platform, software that is specific to the second type of network service; and

executing the software that is specific to the second type of network service to process traffic over the second network connection according to the second type of network service, the software that is specific to the first type of network service being executed simultaneously with the software that is specific to the first type of network service so that the hardware platform can simultaneously process traffic over the first connection and the second connection.

2. (four times amended) The method of claim 1 further comprising configuring a switch to direct the traffic that is associated with the first network connection, after being received from a physical line that transported it, to a processor that performs the executing of the software that is specific to the first type of network service.

3. (twice amended) The method of claim 2 wherein the downloading of the software that is specific to the first type of network service further comprises loading the software that is specific to the first type of network service into a memory that the processor has access to.

4. (three times amended) The method of claim 1 wherein at least one of the types of networking service is a voice transportation service.

5. (three times amended) The method of claim 1 wherein at least one of the types of networking service is an Asynchronous Transfer Mode (ATM) service.

6. (three times amended) The method of claim 1 wherein at least one of the types of networking service is a Frame Relay service.

28. (once amended) A method, comprising:

downloading a first software image to a card that can execute the first software image, the first software image being specific to a first type of networking service so that the card can provide the first type of networking service over a physical line that emanates from the card;

downloading a second software image to the card, the card also able to execute the second software image, the second software image being specific to a second type of networking service so that the card can simultaneously provide the second type of networking service over [a]the physical line [that emanates from the card] with the first type of networking service; and

downloading a third software image to the card, the card also able to execute the third software image, the third software image being specific to a third type of networking service so that the card can simultaneously provide the third type of networking service over [a]the physical line [that emanates from the card]with the first and second types of networking services.

29. (unchanged) The method of claim 28 further comprising loading the first, second and third software images into memory space that is available on the card.

30. (once amended) The method of claim 29 further comprising executing the first, second and third software images so as to simultaneously provide the first, second and third types of networking service.

31. (once amended) The method of claim 28 [further comprising providing the first, second and third types of networking service over a physical line that emanates from the card and that]wherein the physical line transports framed traffic.

32. (unchanged) The method of claim 31 wherein said physical line is a T1/E1 physical line.

33. (once amended) The method of claim 28 wherein [the first type of networking service]one of the types of network service is a voice transportation service.

34. (once amended) The method of claim [31]33 wherein [the second type]another one of the types of network service is an ATM service.

35. (once amended) The method of claim 33 wherein [the third]another one of the types of service is a Frame Relay service.

36. (unchanged) The method of claim 28 further comprising configuring a switch that is located on the card to route traffic between a line interface that is located on the card and a processor that is located on the card and where the processor executes the second software routine.

37. (once amended) The method of claim 28 wherein the downloading of the first software image is in response to a connection of the first networking service type being attempted through the card.

38. (once amended) The method of claim 37 wherein the downloading of the second software image is in response to a connection of the second networking service type being attempted through the card.

39. (once amended) The method of claim 38 wherein the downloading of the third software image is in response to a connection of the third networking service type being attempted through the card.

40. (once amended) A card, comprising:

a) an interface to a physical line, the interface further comprising a line interface unit and a framer;

h) a plurality of processors that can simultaneously execute [any of] a plurality of service specific software routines that are downloaded to the card [in response to a determination that]if the card is to simultaneously provide [any of] a corresponding plurality of [different types of] networking service types over the physical line; and,

[c) a memory that is coupled to the processor and that stores any of the plurality of service specific software routines that the processor is expected to execute in response to the determination; and]

c) a switch that receives ingress traffic from the interface and routes the traffic to the processors.

41. (once amended) The card of claim 40 wherein one of the types of networking service[s] further comprises a voice transportation service.

42. (once amended) The card of claim 41 wherein the plurality of processors further compris[ing]e a plurality of digital signal processors that help to provide the voice transportation service.

43. (once amended) The card of claim 40 wherein one of the types of networking service[s] further comprises an ATM service.

44. (once amended) The card of claim 40 wherein one of the types of networking service[s] further comprises a Frame Relay service.

45. (once amended) A card, comprising:

a) first means for interfacing to a physical line;

b) second means for simultaneously executing [any of] a plurality of service specific software routines that are downloaded to the card [in response to a determination that]if the card is to simultaneously provide [any of] a corresponding plurality of [different types of] networking service types over the physical line; and,

[c) third means for storing any of the plurality of service specific software routines that the second means is expected to execute in response to the determination; and]

c) [~~fourth~~]third means [that]for receiv[es]ing ingress traffic from the first means and rout[es]ing the traffic to the second means.

46. (once amended) The card of claim 45 wherein one of the types of networking service[s] further comprises a voice transportation service.

47. (once amended) The card of claim 45 wherein one of the types of networking service[s] further comprises an ATM service.

48. (once amended) The card of claim 45 wherein one of the types of networking services further comprises Frame Relay.